

BEYS LISTON & MOBARGHA LLP

Joshua D. Liston
646.755.3601 (Direct)
jliston@blmllp.com

December 12, 2016

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Kaleil Isaza Tuzman*, S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We write to advise the Court that, in reliance on an agreement reached today with the Government, Defendant Kaleil Isaza Tuzman withdraws as moot all but one part of his motion to compel production of Rule 16, *Brady*, *Giglio*, and Jencks Act material (the “Motion”) (Dkt. 132). The part of the Motion regarding the Maiden computers and privilege waiver is not moot, and pursuant to the Court’s order, the parties will jointly submit an update by December 16, 2016. (Dkt. 187.)

Respectfully Submitted,

/s Joshua D. Liston

Michael P. Beys, Esq.
Joshua D. Liston, Esq.
Counsel for Kaleil Isaza Tuzman